

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

SCOTT TURNAGE, CORTEZ D.)	
BROWN, DEONTAE TATE, JEREMY S.)	
MELTON, ISSACCA POWELL, KEITH)	
BURGESS, TRAVIS BOYD, and TERRANCE)	
DRAIN on behalf of themselves and all similarly situated persons,)	
)	
Plaintiffs,)	
)	Civil Action No.
v.)	2:16-cv-02907-SHM-tmp
)	Jury Demanded
BILL OLDFHAM, in his individual capacity)	
and in his official capacity as the Sheriff of)	
Shelby County, Tennessee; ROBERT)	
MOORE, in his individual capacity and in)	
his official capacity as the Jail Director of)	
Shelby County, Tennessee; CHARLENE)	
MCGHEE, in her individual capacity and)	
in her official capacity as the Assistant)	
Chief of Jail Security of Shelby County,)	
Tennessee; DEBRA HAMMONS, in her)	
individual capacity and in her official)	
capacity as the Assistant Chief of Jail)	
Programs of Shelby County, Tennessee;)	
SHELBY COUNTY, TENNESSEE, a)	
Tennessee municipality; and TYLER)	
TECHNOLOGIES, INC., a foreign)	
corporation,)	
)	
Defendants.)	

JOINT MOTION TO EXTEND CLASS CERTIFICATION DEADLINES

Plaintiffs Scott Turnage, Cortez D. Brown, Deonte Tate, Jeremy S. Melton, Issacca Powell, Keith Burgess, Travis Boyd, and Terrance Drain (“Plaintiffs”) and Defendants Bill Oldham, Robert Moore, Charlene McGhee, Debra Hammons, Shelby County, Tennessee, and

Tyler Technologies, Inc. (“Defendants”) (collectively, the “Parties”) submit their Joint Motion to Extend Class Certification Deadlines, stating:

1. The Parties seek to extend the deadlines regarding class certification established in the Scheduling Order [Doc. 37] entered by this Court on February 22, 2017.

2. Rule 6(b) of the Federal Rules of Civil Procedure states that “[w]hen an act may or must be done within a specified time, the court may, for good cause, extend the time....” Fed. R. Civ. P. 6(b)(1)(A).

3. Good cause exists for the extension of the class certification deadlines for several reasons. Since the entry of the Scheduling Order in February, the *Brown* matter was transferred to this Court and consolidated into the *Powell* matter. Thereafter the Complaint in the consolidated matters was amended twice. Motions to Dismiss and for Judgment on the Pleadings were filed, and in the face on an amended complaint, were re-submitted, with briefing on these motions just recently completed. Further, the Parties need to take several depositions for class certification discovery purposes. The Parties are presently working to complete written discovery and respectfully request additional time to coordinate and schedule depositions in this matter, which involves many parties and a number of attorneys. Additionally, extending the class certification discovery deadline will not delay this matter as no trial has been set in this case.

4. As such, the Parties respectfully request that the following deadlines be extended as follows:

Class Certification Discovery Deadline: **JANUARY 16, 2018**

Motion for Class Certification Deadline: **FEBRUARY 2, 2018**

Response Brief Deadline: **MARCH 2, 2018**

Reply Brief Deadline: **MARCH 16, 2018**

Sur-Reply Brief Deadline: **MARCH 30, 2018**

WHEREAS, PREMISES CONSIDERED, the Parties respectfully request that the Court extend the deadlines as set forth above.

Respectfully submitted,

s/ Michael G. McLaren

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